

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
	ECF Case

This document relates to:

Fiona Havlish, et al. v. Bin Laden, et al., Case No. 03-cv-09848

John Does 1 Through 7 v. The Taliban, et al., Case No. 20-mc-00740

Federal Insurance Co. v. Al Qaida, et al., Case No. 03-cv-06978

Estate of Smith, et al. v. The Islamic Republic of Iraq, et al., Case No. 01-cv-10132

**NOTICE OF THE JOINT TALIBAN CREDITORS'
MOTION FOR POST-JUDGMENT ATTACHMENT**

PLEASE TAKE NOTICE that Judgment Creditors *Fiona Havlish, et al.* (the “*Havlish Creditors*”), *John Does 1 through 7* (the “*Doe Creditors*”), *Federal Insurance Co., et al.* (the “*Federal Insurance Creditors*”), and *Estate of Smith, et al.* (the “*Smith Creditors*”) (collectively the “Joint Taliban Creditors”), by and through their undersigned counsel, hereby move pursuant to Federal Rule of Civil Procedure 69 and New York Civil Practice Law and Rule § 6201(5) for an order authorizing attachment of the assets of the Taliban held in the name of the Da Afghanistan Bank (“DAB”) at the Federal Reserve Bank of New York (“FRBNY”), as follows:

- On behalf of the *Havlish Creditors* in the amount of \$2,086,386,669.00;
- On behalf of the *Doe Creditors* in the amount of \$138,418,741.00;
- On behalf of Creditor *Vigilant Insurance Company* in the amount of \$126,917,799.72;
- On behalf of Creditor *Chubb Custom Insurance Company* in the amount of \$1,837,755.00;
- On behalf of Creditor *Chubb Indemnity Insurance Company* in the amount of \$12,251,634.60;
- On behalf of Creditor *Federal Insurance Company* in the amount of \$4,541,002,792.17;
- On behalf of Creditor *Chubb Insurance Company of New Jersey* in the amount of \$1,238,045.13;

- On behalf of Creditor *Chubb Insurance Company of Canada* in the amount of \$151,357,187.13;
- On behalf of Creditor *Pacific Indemnity Company* in the amount of \$29,809,609.98;
- On behalf of Creditor *Great Northern Insurance Company* in the amount of \$1,787,991,341.37;
- On behalf of Creditor *AXA Art Insurance Corp.* in the amount of \$42,862,629.00;
- On behalf of Creditor *AXA Global Risks (UK) Ltd.* in the amount of \$32,959,870.71;
- On behalf of Creditor *AXA CSA UK Branch* in the amount of \$194,339,649.00;
- On behalf of Creditor *AXA Insurance Company* in the amount of \$395,088,134.88;
- On behalf of Creditor *AXA Reinsurance Company* in the amount of \$248,144,334.00;
- On behalf of Creditor *AXA RE* in the amount of \$317,370,069.00;
- On behalf of Creditor *AXA RE Canadian Branch* in the amount of \$78,415,221.33;
- On behalf of Creditor *AXA RE UK Plc* in the amount of \$54,488,105.10;
- On behalf of Creditor *AXA Versicherung* in the amount of \$2,769,159.00;
- On behalf of Creditor *SPS RE* in the amount of \$252,915,480.00;
- On behalf of Creditor *American Alternative Insurance Company* in the amount of \$11,768,346.21;
- On behalf of Creditor *Princeton Excess and Surplus Lines Insurance Company* in the amount of \$11,388,877.50;
- On behalf of Creditor *Great Lakes UK Reinsurance Company* in the amount of \$298,534,281.06;
- On behalf of Creditor *OneBeacon Insurance Company* in the amount of \$529,544,956.20;
- On behalf of Creditor *TIG* in the amount of \$228,252,687.90; and
- On behalf of the *Smith* Creditors in the amount of \$59,262,187.57.

The grounds and reasons for granting this relief are stated with particularity in the accompanying Memorandum of Law. A proposed Order is submitted herewith.

Dated: September 30, 2022

Respectfully submitted,

By: /s/ Lee Wolosky
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